

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

-----X	:	Case No. 5:19-cv-00475-BO
JASON WILLIAMS,	:	
	:	
Plaintiff,	:	PARTIES' JOINT MOTION
	:	FOR EXTENSION OF TIME TO
-against-	:	RESPOND/REPLY TO
	:	DEFENDANT'S MOTION FOR
AT&T MOBILITY LLC,	:	SUMMARY JUDGMENT AND
	:	MOTIONS IN LIMINE NO. 1
Defendant.	:	AND NO. 2
-----X	:	

Plaintiff Jason Williams ("Plaintiff") and Defendant AT&T Mobility LLC ("Defendant") (together, the "Parties"), pursuant to Federal Rule of Civil Procedure 6(b) and Local Civil Rules 6.1 and 10.1, hereby move this Court to extend the Parties' deadline to respond/reply to Defendant's Motion for Summary Judgment or For Partial Summary Judgment [Dkt. 118], Motion in Limine (No. 1) to Exclude Evidence of Plaintiff's Alleged Crypto-Mining Damages [Dkt. 121], and Motion in Limine (No. 2) to Exclude Evidence of Emotional Distress of Plaintiff or Family [Dkt. No. 123] (together, the "Motions").

In support of this joint motion, the Parties states the following:

1. Defendant filed the Motions on March 30, 2022.
2. Parties' time to respond/reply to the Motions has not yet expired. The current deadlines for Plaintiff's response and Defendant's reply to the Motions are April 20, 2022 and May 4, 2022, respectively.
3. Counsel for Plaintiff and Defendant conferred and consented to a twelve (12) day extension of Plaintiff's time to respond to the Motions, and a commensurate thirty (30) day extension of Defendant's time to reply to Plaintiff's responses.
4. The Parties' proposed briefing schedule will extend the deadlines for Plaintiff's response and Defendant's reply to the Motions to May 2, 2022 and June 3, 2022, respectively.

5. Notwithstanding due diligence and good faith efforts, the Parties reasonably require the jointly proposed extension of time to complete the briefing in response/reply to the Motions.
6. A proposed order is submitted with this joint motion.

WHEREFORE, the Parties respectfully request that this Court grant this joint motion, and order that the deadline by which Plaintiff must file its responses to Defendant's Motion for Summary Judgment or For Partial Summary Judgment, Motion in Limine (No. 1) to Exclude Evidence of Plaintiff's Alleged Crypto-Mining Damages, and Motion in Limine (No. 2) to Exclude Evidence of Emotional Distress of Plaintiff or Family be extended to May 2, 2022; and Defendant's time to reply to Plaintiff's opposition to each motion be extended to June 3, 2022.

Respectfully submitted this 15th day of April, 2022.

/s/ Christopher N. LaVigne
Christopher N. LaVigne
Withers Bergman LLP
430 Park Avenue, 10th Floor
New York, New York 10022-3505
Telephone: (212) 848-9800
Facsimile: (212) 848-9888
christopher.lavigne@withersworldwide.com
State Bar No. NY 4811121

Counsel for Plaintiff Jason Williams

/s/ Terence S. Reynolds
SHUMAKER LOOP & KENDRICK LLP
101 South Tyron Street, Suite 2200
Charlotte, North Carolina 28280
Telephone: (704) 375-0057
Facsimile: (704) 332-1197
treynolds@shumaker.com
State Bar No. 49848

*Local Civil Rule 83.1(d) Counsel for
Plaintiff Jason Williams*

/s/ Nancy L. Stagg
Nancy L. Stagg
**KILPATRICK TOWNSEND
& STOCKTON LLP**
12255 El Camino Real, Suite 250
San Diego, CA 92130
Telephone: (858) 350-6156
Facsimile: (858) 408-3931
nstagg@kilpatricktownsend.com

Counsel for Defendant AT&T Mobility, LLC